

EXHIBIT 1

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

RENEE JOHNSON,
for herself and all others similarly situated,
Plaintiff,
v.

CELLCO PARTNERSHIP d/b/a VERIZON
WIRELESS,
Defendant.

Case No. 21-cv-187

Hon. Gary Feinerman

NOTICE OF LAWSUIT

*This Notice was authorized by the United States District Court for the
Northern District of Illinois. This is not a solicitation from a lawyer.*

WHY HAVE I RECEIVED THIS NOTICE?

This Notice has been mailed to you because you have worked for Verizon Wireless as a full-time, hourly-paid, phone-based Customer Service, Sales, or Technical Support Consultant in Illinois since [three years before date of conditional certification order]. This Notice is meant to tell you about a lawsuit that may relate to you, explain your rights and help you join the lawsuit if you so choose.

WHAT IS THE LAWSUIT ABOUT?

Renee Johnson (“Plaintiff”) filed a lawsuit against Verizon Wireless (“Defendant”) under the Fair Labor Standards Act, 29 U.S.C. §§ 201 *et seq.* (“FLSA”) and the Illinois Minimum Wage Law, 820 ILCS § 105 *et seq.* (“IMWL”). Plaintiff claims that Defendant violated these wage laws by:

1. Allowing full-time, hourly-paid, phone-based Customer Service, Sales, or Technical Support Consultants to spend approximately 15 minutes per day performing job-related tasks before the scheduled start of their shift without tracking this work or paying any overtime wages for it;
2. Allowing full-time, hourly-paid, Customer Service, Sales, or Technical Support Consultants to spend about 30 minutes per day performing job-related tasks during their unpaid meal breaks without tracking this work or paying any overtime wages for it; and
3. Allowing full-time, hourly-paid, phone-based Customer Service, Sales, or Technical Support Consultants to spend about 15 minutes per day performing job-related tasks after the scheduled end of their shift without tracking this work or paying any overtime wages for it.

Plaintiff contends that Defendant’s supervisors knew (or should have known) about this unpaid work, but did not make any serious effort to: track the time she and other employees spent on pre-

shift, meal break or post-shift work; pay her or other employees at the legally-required overtime premium rate for all of the overtime hours they actually worked; or address and resolve complaints made about these issues by ensuring that she and other employees were paid all of the overtime wages due for work they performed. Plaintiff seeks to recover unpaid overtime wages owed to all full-time, hourly-paid, phone-based Customer Service, Sales, or Technical Support Consultant for Verizon Wireless who join this lawsuit.

Defendant denies that it has committed the violations described above. Defendant claims that its policies and procedures comply with all applicable federal and state laws and that Plaintiff and all of its full-time, hourly-paid, phone-based Customer Service, Sales, or Technical Support Consultant have been correctly paid for their work.

WHAT IS THE STATUS OF THE CASE?

The case is at an early stage. The Court has authorized this Notice to be issued to all people who have worked for Verizon Wireless as a full-time, hourly-paid, phone-based Customer Service, Sales, or Technical Support Consultant in Illinois since [three years before date of conditional certification order]. The Court has not yet taken any position on the merits of Plaintiff's claims or Defendant's defenses. This Notice is not an expression by the Court about the merits of this case, or whether Plaintiff's claims will ultimately be litigated or tried on a class-wide basis. If the Court ultimately determines you are not similarly situated to the Plaintiff, it may dismiss your claim.

WHO CAN JOIN THE CASE?

All people who have worked for Verizon Wireless as a full-time, hourly-paid, phone-based Customer Service, Sales, or Technical Support Consultant in Illinois since [three years before date of conditional certification order] are eligible to join the case.

HOW CAN I JOIN THE CASE?

You can join the case by completing the attached Consent Form and mailing, faxing, or e-mailing it to:

[Name to be added]
Verizon Wireless Overtime Lawsuit
[Address to be added]
Phone: [to be added]
Fax: [to be added]
E-mail: [to be added]

Your Consent Form must be postmarked, faxed or e-mailed by [60 days from mailing date]. Plaintiff's attorneys will file all properly completed and delivered Consent Forms with the Court. If you do not wish to join this lawsuit, do not return the Consent Form. Whether you join this lawsuit is entirely up to you.

STATUTE OF LIMITATION ISSUES

Federal law sets certain deadlines for employees to bring wage and hour claims. The longest period of time an employee can wait before bringing these claims is three years. If you do not join this lawsuit now, the statute of limitations may prevent you from doing so later.

WHAT IS THE EFFECT OF JOINING THIS CASE?

If you join this case, you and Defendant will be bound by any ruling or judgment the Court enters, whether favorable or unfavorable. While the lawsuit is proceeding, you may be required to provide Defendant with documents, information, or testimony relating to your claim. By joining the lawsuit, you designate Plaintiff as your agent and authorize her to make decisions concerning all matters pertaining to this lawsuit. If this lawsuit recovers money for the Class and you possess a valid, timely claim, you may be entitled to a payment in return for a release of your claim.

If you do not join this case, you will retain any rights you may have under the FLSA and IMWL. You will not be bound by any ruling or judgment the Court enters. You will not have any responsibilities with respect to the case. However, if this lawsuit recovers money for the Class, you will not receive a payment.

YOUR LEGAL REPRESENTATION IF YOU JOIN

If you return the Consent Form to join this lawsuit, you will be represented by James B. Zouras of Stephan Zouras LLP (Chicago, IL) and David J. Cohen of Stephan Zouras LLP (Philadelphia, PA). Plaintiff's attorneys have taken this case on a contingency basis meaning that, if this lawsuit results in a payment to the Class, they will ask the Court to approve a fee for their work and reimbursement of their case-related costs. However, if this lawsuit does not result in a payment to the Class, Plaintiff's attorneys will not receive any fee or any cost reimbursement. You may retain your own counsel and/or file your own separate lawsuit should you choose to do so.

Please do not contact the Court with questions about this lawsuit or this Notice.

CONSENT TO BECOME A PARTY PLAINTIFF

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Please complete and mail, fax or e-mail both pages of this form to:

[Name to be added]
Verizon Wireless Overtime Lawsuit
[Address to be added]
Phone: [to be added]
Fax: [to be added]
E-mail: [to be added]

By signing below, I affirm that I have worked for Verizon Wireless as a full-time, hourly-paid, phone-based Customer Service, Sales, or Technical Support Consultant in Illinois since [three years before date of conditional certification order] and hereby consent to join this lawsuit seeking unpaid overtime wages based on Defendant's alleged violations of the Fair Labor Standards Act, 29 U.S.C. § 201, *et. seq.*

I designate Stephan Zouras LLP, and any other attorneys with whom it may associate, to represent me for all purposes of this action.

I designate the Class Representative as my agent to make decisions on my behalf concerning the litigation, the method and manner of conducting this litigation, settlement, the entering of agreements with Plaintiff's counsel concerning attorneys' fees and costs, and all other matters pertaining to this lawsuit.

If this case does not ultimately proceed on a collective basis, I consent to join any subsequent action to assert these claims on my behalf.

Today's Date

Your Signature

Clearly Print Your Name

*****Note: This Page Will Not Be Filed With the Court*****

NAME: _____

ADDRESS: _____

CITY: _____ STATE: _____ ZIP CODE: _____

TELEPHONE NUMBER: _____

E-MAIL ADDRESS: _____

DATES OF EMPLOYMENT WITH VERIZON WIRELESS:

VERIZON WIRELESS JOB TITLE(S):

VERIZON WIRELESS A LOCATION(S) WHERE YOU WORKED:

RATE(S) OF PAY AT VERIZON WIRELESS:
